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November 26, 2018

*Via ECF*

Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201-1818

**Re: United States v. Napout, et al., 15 Cr. 252 (S-2) (PKC)**

Dear Judge Chen:

On behalf of our client, José Maria Marin, we write to respectfully request that the Court amend Mr. Marin's September 11, 2018 Judgment (ECF Dkt. No. 1015) to extend the date by which he must satisfy his criminal fine and forfeiture obligations, from November 27, 2018 to December 14, 2018. As we advised the Court at the recent restitution hearing, we are in discussions with the government as to how certain of Mr. Marin's frozen assets may be released to satisfy these obligations. After speaking today with AUSA Sam Nitze, the government consents to this request for an amendment of the payment date for the fine and forfeiture amounts to December 14, 2018, while reserving the right for Mr. Marin to seek a further amendment should additional time be necessary to complete the process of releasing these assets.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ JAM

James A. Mitchell

cc: All counsel (by ECF)